

THE HONORABLE MARSHA J. PECHMAN

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON (SEATTLE)

PROKOP LABS, LLC, a Washington  
limited liability company,

Plaintiff,

v.

STAPLES, INC., a Delaware corporation;  
STAPLES THE OFFICE SUPERSTORE,  
LLC, a Delaware limited liability company;  
BELKIN, INC., a Delaware corporation  
(formerly BELKIN LOGISTICS, INC.) S.P.  
RICHARDS CO., a Georgia corporation;  
and VELO ENTERPRISE CO., LTD., a  
Taiwan corporation,

Defendants.

No. 2:07-cv-1094-MJP

STIPULATION AND [PROPOSED]  
PROTECTIVE ORDER

NOTE FOR MOTION CALENDAR:  
AUGUST 17, 2012

Pursuant to Federal Rule of Civil Procedure 26, Plaintiff Prokop Labs, LLC and Defendants Belkin, Inc., formerly Belkin Logistics, Inc., S.P. Richards Co., Staples, Inc., Staples The Office Superstore, LLC, and Velo Enterprise Co., Ltd. hereby stipulate to entry of the Protective Order attached hereto as Exhibit A. The grounds for the stipulated protective order are set forth therein.

STIPULATED AND AGREED TO this 17<sup>th</sup> day of August, 2012.

By: /s/ Kevin A. Zeck  
Kevin A. Zeck, WSBA No. 41689  
KZeck@perkinscoie.com  
Jerry Riedinger, WSBA No. 25828  
JRiedinger@perkinscoie.com  
PERKINS COIE LLP  
1201 Third Avenue, Suite 4800  
Seattle, WA 98101-3099  
Tel: (206) 359-8000  
Fax: (206) 359-9000

*Attorneys for Plaintiff PROKOP LABS, LLC*

By: /s/ Vision L. Winter (with permission)  
Michael A. Moore, WSBA No. 27047  
CORR CRONIN MICHELSON  
BAUMGARDNER & PREECE LLP  
1001 Fourth Avenue, Suite 3900  
Seattle, Washington 98154-1051

Ryan K. Yagura (*Pro Hac Vice*)  
Vision L. Winter (*Pro Hac Vice*)  
Soyoung Jung (*Pro Hac Vice*)  
Brian M. Berliner (*Pro Hac Vice*)  
O'MELVENY & MYERS LLP  
400 S. Hope Street  
Los Angeles, CA 90071-2338

*Attorneys for Defendants BELKIN,  
INC., formerly BELKIN LOGISTICS, INC.,  
STAPLES, INC., and STAPLES THE  
OFFICE  
SUPERSTORE LLC*

By: /s/ Benjamin Bailey (with permission)  
John H. Jamnback, WSBA No. 29872  
YARMUTH WILSON CALFO, PLLC  
Fourth & Madison  
925 Fourth Avenue, Suite 2500  
Seattle, WA 98104

Douglas S. Weinstein (*Pro Hac Vice*)  
Benjamin Bailey (*Pro Hac Vice*)  
William B. Dyer, III (*Pro Hac Vice*)  
FINNEGAN HENDERSON

FARABOW GARRETT & DUNNER LLP  
303 Peachtree Street NE, Suite 3500  
Atlanta, GA 30308-6470

*Attorneys for Defendant VELO ENTERPRISE  
CO. LTD & Third Party Defendants AIDATA  
USA CO. INC and AIDMA ENTERPRISE CO.  
LTD.*

By: /s/ John M. Bowler (with permission)  
John M. Bowler (*Pro Hac Vice*)  
TROUTMAN SANDERS LLP  
600 Peachtree Street NE, Suite 5200  
Atlanta, GA 30308-2216

Thomas R. Merrick, WSBA No. 10945  
MERRICK HOFSTEDT & LINDSEY, PS  
3101 Western Avenue, Suite 200  
Seattle, WA 98121-3017

*Attorneys for Defendant S.P. RICHARDS  
CO.*

CERTIFICATE OF SERVICE

I hereby certify that on August 17, 2012, I served the foregoing document and attached exhibit on the following persons via the method indicated below:

<u>Attorneys for Belkin, Inc., formerly Belkin</u>	<input type="checkbox"/>	by <b>CM/ECF</b>
<u>Logistics, Inc.:</u>	<input checked="" type="checkbox"/>	by <b>Electronic Mail</b>
Ryan Yagura	<input type="checkbox"/>	by <b>Facsimile Transmission</b>
ryagura@omm.com	<input type="checkbox"/>	by <b>First Class Mail</b>
Vision L Winter	<input type="checkbox"/>	by <b>Hand Delivery</b>
vwinter@omm.com	<input type="checkbox"/>	by <b>Overnight Delivery</b>
Todd Fitzsimmons		
tfitzsimmons@omm.com		
O'Melveny & Myers LLP		
400 S Hope Street		
Los Angeles, CA 90071-2899		

Michael A. Moore	<input type="checkbox"/>	by <b>CM/ECF</b>
mmoore@corrchronin.com	<input checked="" type="checkbox"/>	by <b>Electronic Mail</b>
Corr Cronin Michelson	<input type="checkbox"/>	by <b>Facsimile Transmission</b>
Baumgardner & Preece LLP	<input type="checkbox"/>	by <b>First Class Mail</b>
1001 Fourth Avenue, Suite 3900	<input type="checkbox"/>	by <b>Hand Delivery</b>
Seattle, WA 98154-1051	<input type="checkbox"/>	by <b>Overnight Delivery</b>

<u>Attorneys for Staples, Inc. and Staples the</u>	<input type="checkbox"/>	by <b>CM/ECF</b>
<u>Office Superstore, LLC:</u>	<input checked="" type="checkbox"/>	by <b>Electronic Mail</b>
Ryan Yagura	<input type="checkbox"/>	by <b>Facsimile Transmission</b>
ryagura@omm.com	<input type="checkbox"/>	by <b>First Class Mail</b>
O'Melveny & Myers LLP	<input type="checkbox"/>	by <b>Hand Delivery</b>
400 S Hope Street	<input type="checkbox"/>	by <b>Overnight Delivery</b>
Los Angeles, CA 90071-2899		

Michael A. Moore  
mmoore@corrchronin.com  
Corr Cronin Michelson  
Baumgardner & Preece LLP  
1001 Fourth Avenue, Suite 3900  
Seattle, WA 98154-1051

Attorneys for S.P. Richards Co.:

John M Bowler  
john.bowler@troutmansanders.com  
Troutman Sanders LLP  
600 Peachtree Street NE, Suite 5200  
Atlanta, GA 30308-2216

☐ by CM/ECF  
☒ by **Electronic Mail**  
☐ by **Facsimile Transmission**  
☐ by **First Class Mail**  
☐ by **Hand Delivery**  
☐ by **Overnight Delivery**

Thomas R Merrick  
tmerrick@mhlseattle.com  
Merrick, Hofstedt & Lindsey, PS  
3101 Western Avenue, Suite 200  
Seattle, WA 98121-3017  
Phone: (206) 682-0610  
Fax: (206) 467-2689

☐ by CM/ECF  
☒ by **Electronic Mail**  
☐ by **Facsimile Transmission**  
☐ by **First Class Mail**  
☐ by **Hand Delivery**  
☐ by **Overnight Delivery**

Attorneys for Velo Enterprise Co., Ltd.,  
Aidata USA Co. Inc., and Aidma Enterprise  
Co. Ltd.:

Douglas Weinstein  
douglas.weinstein@finnegan.com  
Benjamin D. Bailey  
benjamin.bailey@finnegan.com  
William Dyer  
bill.dyer@finnegan.com

☐ by CM/ECF  
☒ by **Electronic Mail**  
☐ by **Facsimile Transmission**  
☐ by **First Class Mail**  
☐ by **Hand Delivery**  
☐ by **Overnight Delivery**

Finnegan Henderson Farabow  
Garrett & Dunner LLP  
303 Peachtree Street NE, Suite 3500  
Atlanta, GA 30308-3263  
Phone: (404) 653-6470  
Fax: (404) 653-6444

John H Jamnback  
jjamnback@yarmuth.com  
Yarmuth Wilsdon Calfo PLLC  
Fourth & Madison  
925 Fourth Avenue, Suite 2500  
Seattle WA 98104  
Tel: (206) 516-3800

☐ by CM/ECF  
☒ by **Electronic Mail**  
☐ by **Facsimile Transmission**  
☐ by **First Class Mail**  
☐ by **Hand Delivery**  
☐ by **Overnight Delivery**

/s/Kevin A. Zeck

Kevin A. Zeck